UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY, MARISSA BLAIR, APRIL MUNIZ, MARCUS MARTIN, NATALIE ROMERO, CHELSEA ALVARADO, JOHN DOE, and THOMAS BAKER,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER, CHRISTOPHER CANTWELL, JAMES ALEX FIELDS, JR., VANGUARD AMERICA, ANDREW ANGLIN, MOONBASE HOLDINGS, LLC, ROBERT "AZZMADOR" RAY, NATHAN DAMIGO, ELLIOT KLINE a/k/a/ ELI MOSLEY, IDENTITY EVROPA, MATTHEW HEIMBACH, MATTHEW PARROTT a/k/a DAVID MATTHEW PARROTT, TRADITIONALIST WORKER PARTY, MICHAEL HILL, MICHAEL TUBBS, LEAGUE OF THE SOUTH, JEFF SCHOEP, NATIONAL SOCIALIST MOVEMENT. NATIONALIST FRONT, AUGUSTUS SOL INVICTUS, FRATERNAL ORDER OF THE ALT-KNIGHTS, MICHAEL "ENOCH" PEINOVICH, LOYAL WHITE KNIGHTS OF THE KU KLUX KLAN, and EAST COAST KNIGHTS OF THE KU KLUX KLAN a/k/a EAST COAST KNIGHTS OF THE TRUE INVISIBLE EMPIRE,

Civil Action No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

Defendants.

PLAINTIFFS' SUBMISSION REGARDING ROBERT "AZZMADOR" RAY

In response to the Court's Order dated August 27, 2020, ECF No. 849, Plaintiffs state that they intend to rely on the following evidence at the Show Cause Hearing for Defendant Robert "Azzmador" Ray on September 14, 2020, at 2:00 p.m.:

- Court Orders regarding Ray (ECF Nos. 379, 383, 728, 814, 848)
- Plaintiffs' filings regarding Ray (ECF Nos. 673, 750, 803, 818) and exhibits thereto
- Email correspondence with Ray
- Ray's social media certification
- Ray's responses to Plaintiffs' Interrogatories and Requests for Production
- The third-party discovery vendor's status reports

Date: September 9, 2020 Respectfully submitted,

/s/ Jessica E. Phillips

Karen L. Dunn (pro hac vice)
Jessica E. Phillips (pro hac vice)
William A. Isaacson (pro hac vice)
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
2001 K Street, NW
Washington, DC 20006
Telephone: (202) 223-7300

Fax: (202) 223-7420 kdunn@paulweiss.com jphillips@paulweiss.com wisaacson@paulweiss.com

Counsel for Plaintiffs

Robert T. Cahill (VSB 38562) COOLEY LLP 11951 Freedom Drive, 14th Floor Reston, VA 20190-5656 Telephone: (703) 456-8000

Fax: (703) 456-8100 rcahill@cooley.com

Alan Levine (pro hac vice)
Philip Bowman (pro hac vice)
COOLEY LLP
55 Hudson Yards
New York, NY 10001
Telephone: (212) 479-6260
Fax: (212) 479-6275

Fax: (212) 479-6275 alevine@cooley.com pbowman@cooley.com

J. Benjamin Rottenborn (VSB 84796) WOODS ROGERS PLC 10 South Jefferson St., Suite 1400 Roanoke, VA 24011 Telephone: (540) 983-7600

Fax: (540) 983-7711

brottenborn@woodsrogers.com

Of Counsel:

Roberta A. Kaplan (pro hac vice)
Julie E. Fink (pro hac vice)
Gabrielle E. Tenzer (pro hac vice)
Michael L. Bloch (pro hac vice)
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110
New York, NY 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
gtenzer@kaplanhecker.com
mbloch@kaplanhecker.com

David E. Mills (pro hac vice)
Joshua M. Siegel (VSB 73416)
COOLEY LLP
1299 Pennsylvania Avenue, NW
Suite 700
Washington, DC 20004
Telephone: (202) 842-7800
Fax: (202) 842-7899
dmills@cooley.com
jsiegel@cooley.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2020, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

Justin Saunders Gravatt
David L. Hauck
David L. Campbell
Duane, Hauck, Davis & Gravatt, P.C.
100 West Franklin Street, Suite 100
Richmond, VA 23220
jgravatt@dhdglaw.com
dhauck@dhdglaw.com
dcampbell@dhdglaw.com

Counsel for Defendant James A. Fields, Jr.

Bryan Jones 106 W. South St., Suite 211 Charlottesville, VA 22902 bryan@bjoneslegal.com

Counsel for Defendants Michael Hill, Michael Tubbs, and League of the South Elmer Woodard 5661 US Hwy 29 Blairs, VA 24527 isuecrooks@comcast.net

James E. Kolenich Kolenich Law Office 9435 Waterstone Blvd. #140 Cincinnati, OH 45249 jek318@gmail.com

Counsel for Defendants Matthew Parrott, Traditionalist Worker Party, Jason Kessler, Nathan Damigo, and Identity Europa, Inc. (Identity Evropa)

William Edward ReBrook , IV The Rebrook Law Office 6013 Clerkenwell Court Burke, VA 22015 edward@rebrooklaw.com

Counsel for Defendants Jeff Schoep, National Socialist Movement, and Nationalist Front

I further hereby certify that on September 9, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

Elliot Kline eli.f.mosley@gmail.com

Robert Ray azzmador@gmail.com

Vanguard America c/o Dillon Hopper dillon hopper@protonmail.com Matthew Heimbach matthew.w.heimbach@gmail.com

Christopher Cantwell @gmail.com

Richard Spencer richardbspencer@icloud.com

/s/ Jessica E. Phillips

Karen L. Dunn (pro hac vice)
Jessica E. Phillips (pro hac vice)
William A. Isaacson (pro hac vice)
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
2001 K Street, NW
Washington, DC 20006
Telephone: (202) 223-7300
Fax: (202) 223-7420
kdunn@paulweiss.com
jphillips@paulweiss.com
wisaacson@paulweiss.com

Counsel for Plaintiffs